

DAVID T. MALOOF (DM 3350)
THOMAS M. EAGAN (TE 1713)
MALOOF BROWNE & EAGAN LLC
411 Theodore Fremd Avenue, Suite 190
Rye, New York 10580-1411
(914) 921-1200
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SOMPO JAPAN INSURANCE COMPANY OF
AMERICA,

Plaintiff,

- against -

HANKYU EXPRESS INTERNATIONAL CO.,
LTD., and KOREAN AIR LINES CO., LTD.

Defendants.

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KOREAN AIR LINES CO., LTD.,

Third-Party Plaintiff,

- against -

INTERNATIONAL CARGO MARKETING
CONSULTANTS, INC. d/b/a ALLIANCE
AIRLINES

Third-Party Defendant.

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07 Civ. 6476 (THK)

**JOINT
SCHEDULING REPORT**

HANKYU EXPRESS INTERNATIONAL CO., :
LTD., :

Third-Party Plaintiff, :

- against - :

DELTA AIR LINES, INC., :

Third-Party Defendant. :

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Plaintiff, Sampo Japan Insurance Company of America (hereinafter "Sampo" or "Plaintiff") and Defendants Hankyu Express International Co., Ltd. (hereinafter "Hankyu") and Korean Air Lines Co., Ltd. (hereinafter "Korean Air") (collectively "Defendants"), as well as Third-Party Defendants International Cargo Marketing Consultants, Inc. d/b/a Alliance Airlines (hereinafter "Alliance") and Delta Air Lines, Inc. (hereinafter "Delta") (collectively "Third-Party Defendants"), through respective undersigned counsel, submit their Joint Scheduling Report as follows:

1. Appearances

For the Plaintiff:

Todd A. Barton

Maloof Browne & Eagan, LLC

411 Theodore Fremd Avenue – Suite 190

Rye, New York 10580

Tel: (914) 921-1200

Attorneys for Plaintiff Sampo Japan Insurance Company of America

For the Defendants:

Kevin J. Philbin
Mendes & Mount, LLP
750 Seventh Avenue
New York, NY 10019-6829
Tel: (212) 261-8000

Attorneys for Defendant/Third-Party Plaintiff Hankyu Express International Co., Ltd.

Andrew J. Harakas
Clyde & Co US LLP
The Chrysler Building
405 Lexington Avenue
New York, NY 10174
Tel: (212) 710-3900

Attorneys for Defendant/Third-Party Plaintiff Korean Air Lines Co., Ltd.

For the Third-Party Defendants:

Edward Farman
Schindel, Farman, Lipsius, Gardner & Rabinovich, LLP
14 Penn Plaza, Suite 500
New York, NY 10122
Tel: (212) 563-1710

Attorneys for Third-Party Defendant International Cargo Marketing Consultants, Inc. d/b/a Alliance Airlines

Francis A. Montbach
Mound Cotton Wollan & Greengrass
One Battery Park Plaza
New York, NY 10004-1486
Tel: (212) 804-4200

Attorneys for Third-Party Defendant Delta Air Lines, Inc.

2. Statement of the Issues

When and in whose care were the three shipments of automotive parts damaged, the extent of liability, and damages. Whether plaintiff and/or its subrogor provided timely written notice of claim, and whether defendants and/or third-party defendants are entitled to the protection of any of the other affirmative defenses provided by the Montreal

Convention and/or the carriers' tariffs and conditions of contract.

3. Proposed Schedule:

(a) Deadline to Amend Pleadings/Add Parties

The parties may amend the pleadings and/or add parties up to and including December 21, 2007.

(b) Names of Persons to be Deposed/Schedule of Depositions

Not yet ascertained.

(c) Schedule for Production of Documents

Rule 26(a)(1) Disclosures and first document demands shall be served by December 21, 2007.

(d) Expert Discovery

(i) Expert Reports

Parties shall exchange expert reports by April 14, 2008.

(ii) Expert Discovery

Expert discovery shall be completed by April 30, 2008.

(e) Discovery Completion

Factual discovery shall be completed by April 30, 2008.

(f) Pretrial Order Materials to Defendant

Plaintiff shall give Defendants all pretrial order materials by May 30, 2008.

(g) Pretrial Order Materials to the Court

All pretrial order materials shall be given to the Court by June 16, 2008.

(h) Date of Final Pretrial Conference

_____, 20__

4. Limitations on Discovery

None.

5. Discovery Issues

None at this time.

6. Anticipated Fields of Expert Testimony

None at this time.

7. Anticipated Length of Trial

One (1) day bench trial.

8. The parties do not unanimously consent to trial before a magistrate.

9. Status of settlement discussions

The parties agree to discuss settlement and request a settlement conference no later than at the close of early discovery (or earlier).

10. Privilege

- (a) The parties shall agree on a date to exchange privilege logs.
- (b) Assertions of privilege and work product shall be permitted for documents produced for a period of up to 60 days after production.


11. Electronic Discovery

- (a) Emails and other electronic data shall be produced either on disks or printed out as if they were hard copy documents. Emails shall be searched under terms identifying the shipment in question or as otherwise reasonably demanded. Data contained in backup logs/tapes need not be produced unless shown by circumstances to be

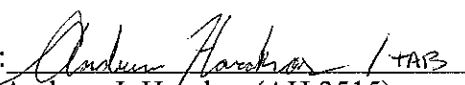
necessary. No party shall intentionally erase any relevant data or intentionally move any relevant data to backup logs.

Dated: Rye, New York
December 3, 2007

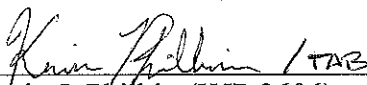
MALOOF BROWNE & EAGAN LLC

By: 
Todd A. Barton (TB 0908)
411 Theodore Fremd Avenue – Suite 190
Rye, New York 10580
Tel: (914) 921-1200
Fax: (914) 921-1023
Email: dmaloof@maloofandbrowne.com
*Attorneys for Plaintiff Sampo Japan Insurance
Company of America*

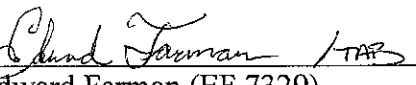
CLYDE & CO US LLP

By: 
Andrew J. Harakas (AH 3515)
The Chrysler Building
405 Lexington Avenue
New York, NY 10174
Tel: (212) 710-3900
Fax: (212) 710-3950
Email: andrew.harakas@clydeco.us
*Attorneys for Defendant/Third-Party Plaintiff
Korean Air Lines Co., Ltd.*

MENDES & MOUNT, LLP

By: 
Kevin J. Philbin (KJP 3606)
750 Seventh Avenue
New York, NY 10019-6829
Tel: (212) 261-8000
Fax: (212) 261-8750
Email: Kevin.philbin@mendes.com
*Attorneys for Defendant/Third-Party Plaintiff
Hankyu Express International Co., Ltd.*

SCHINDEL, FARMAN, LIPSIOUS,
GARDNER & RABINOVICH LLP

By: 
Edward Farman (EF 7329)
14 Penn Plaza, Suite 500
New York, NY 10122
Tel: (212) 563-1710
Fax: (212) 695-6602
Email: efarman@sfl-legal.com
*Attorneys for Third-Party Defendant
International Cargo Marketing Consultants, Inc.
d/b/a Alliance Airlines*

MOUND COTTON WOLLAN &
GREENGRASS

By: Francis Montbach /TMB
Francis A. Montbach (FAM 9631)

One Battery Park Plaza

New York, NY 10004-1486

Tel: (212) 804-4200

Fax: (212) 344-8066

Email: fmontbach@moundcotton.com

*Attorneys for Third-Party Defendant Delta Air
Lines, Inc.*